

REMARKS

The Office Action of March 14, 2003 has been received and its contents carefully noted. Concurrently filed herewith is a *Request for a Two (2) Month Extension of Time* that extends the shortened statutory period for response until August 14, 2003. Accordingly, Applicants respectfully submit that this response is timely filed and fully responsive to the Office Action.

Claims 1-45 are currently pending in the instant application of which claims 1, 3, 6, 9, 32, 33 and 34 are independent. Claims 1, 9 and 44 are amended herein. Applicants respectfully submit that no issue of new matter is presented by this amendment.

Turning to the rejections, on page 2 of the Office Action, claims 1-8, 10-20 and 32-45 are rejected under 35 U.S.C. §112, first paragraph, and 35 U.S.C. §112, second paragraph. Specifically, the Examiner indicated that the phrase “wherein said n-speed field sequential color signal generation circuit comprises at least one third thin film transistor over said substrate” is not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the invention was filed, had possession of the invention and is not definite.

Addressing the 35 U.S.C. §112, second paragraph rejections, Applicants respectfully submit that by the foregoing amendment, that independent claim 1 has been amended to recite “said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate”. Applicants submit that this amendment clarifies the claim language and resolves the rejection under 35 U.S.C. §112, second paragraph.

With regard to the 35 U.S.C. §112, first paragraph rejection, Applicants submit that support for and sufficient description of this feature can, for example be found in the paragraph bridging pages 24 and 25, of the specification. More specifically, this paragraph discloses that:

“Figs. 15-18 show an example case of forming a plurality of TFTs on a substrate having an insulating surface and fabricating a pixel matrix circuit, a driving circuit, a logic circuit, etc. in a monolithic structure...It is also possible to form the A/D converter circuit, the n-speed field sequential color signal generation circuit, the LCD controller and the LED turn-on circuit integrally with the LCD.”

The above referenced paragraph, along with the disclosures of Figs. 15-18, and their written description, provides a description in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the invention was filed, had possession of the invention.

Additionally, Applicants wish to remind the Examiner that the test for determining compliance with the written description requirement is whether the disclosure of the application as originally filed reasonably conveys to the artisan that the inventor had possession at that time of the later claimed subject matter, rather than the presence or absence of literal support in the specification for the claim language. In re Kaslow, 217 USPQ 1059, 1076 (Fed. Cir. 1983). Ex parte Remark, 15 USPQ2d 1498, 1506 (PBAI 1990). The content of the drawings may also be considered in determining compliance with the written description requirement. Kaslow, supra. Thus, Applicants respectfully request reconsideration and withdrawal of the rejections.

With regard to the remaining independent claims, Applicants submit that the phrase “wherein said n-speed field sequential color signal generation circuit comprises at least one third thin film transistor over said substrate” pointed out in the rejection is not resident in any of the remainder of independent claims. However, any remaining questions regarding Applicants description of the thin film transistors and the n-speed field sequential color signal generator is addressed by the discussion in the previous paragraph. Accordingly, Applicants submit that all pending claims are proper under 35 U.S.C. §112, first paragraph. Minor typographical errors also have been addressed by amendments in claims 9 and 44. Applicants respectfully request reconsideration and withdrawal of these rejections.

Addressing the cited art rejections, the Examiner rejects claims 1-9 under 35 U.S.C. §103(a) as unpatentable over Applicant’s Admitted Prior Art in view of U.S. Patent No. 4,090,219 to Ernstoff et al. (Hereinafter “Ernstoff”), and further in view of U.S. Patent No. 6,300,927 to Kubota et al. (Hereinafter “Kubota”) claims 10-31 under 35 U.S.C. §103(a) as unpatentable over Applicant’s Admitted Prior Art in view of Ernstoff and Kubota, further in view of U.S. Patent No. 5,528,262 to McDowall et al. (Hereinafter “McDowall”), claims 32-34 under 35 U.S.C. §103(a) as unpatentable over Applicant’s Admitted Prior Art in view of Ernstoff and Kubota and further in view of U.S. Patent No. 5,327,229 to Konno et al. (Hereinafter “Konno”), and claims 35-45 under 35 U.S.C. §103(a) as unpatentable over

Applicants' Admitted Prior Art in view of Ernststoff, Kubota, Konno and further in view of McDowall.

Applicants traverse these rejections at least as to claims 1-45. More particularly, it is contended that the proposed combination presented in the Office Action fails to expressly teach or implicitly suggest every limitation of the claimed invention necessary to support *prima facie* obviousness under 35 U.S.C. §103(a).

Independent claim 1 of the claimed invention is directed generally to a driving method for a liquid crystal display comprising, *inter alia*, compressing original video signals by $1/(3n)$ times in a time axis direction by a n-speed field sequential color signal generation circuit, wherein said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate.

Independent claim 3 of the claimed invention is directed generally to a liquid crystal display, including, *inter alia*, an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein said n-speed field sequential color signal generation circuit comprises thin film transistors formed over said substrate.

Independent claim 6 of the claimed invention is directed generally to a liquid crystal display comprising, *inter alia*, an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein said n-speed field sequential color signal generation circuit comprises thin film transistors formed over said substrate.

Independent claim 9 of the claimed invention is directed generally to a method for driving a liquid crystal display wherein said liquid crystal display comprises a plurality of first thin film transistors formed over a substrate and said n-speed field sequential color signal generation circuit is formed over said substrate.

Independent claims 32-34 of the claimed invention are each directed generally to a method for displaying a liquid crystal display comprising, *inter alia*, compressing original blue video signal entered from outside by $1/(3n)$ into a blue video signal by an n-speed field sequential color signal generation circuit operationally connected to said at least one backlight and said display section, wherein n is an integer larger than 2 representing a number of subframes, wherein said n-speed field sequential color signal generation circuit comprises at least one thin film transistor formed over said substrate.

Turning now to the rejection, on page 4 of the Office Action the Examiner appears to admit that Applicants' admitted prior art does not teach an n-speed field sequential color signal generation circuit, and the Examiner does not appear to even address the further recitation that wherein said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate, as recited in independent claim 1, for example. Similar features as discussed above, are recited in each of the remaining independent claims.

Instead, Applicants are left to interpret the Examiner's indication that "...it is clear that there has to be some type of circuitry to compress the incoming RGB video signals and some type of signal to the backlight for turning on the LEDs accordingly." Applicants are unsure what type of reasoning the Examiner is providing with this statement. If the examiner is insinuating that the signal generation circuit is inherent, Applicants submit that no proper explanation of inherency has been provided. The Examiner appears to be guessing that a n-speed field sequential color signal generation circuit would have to be present without providing any concrete technical analysis. Applicants wish to remind the Examiner that to establish inherency, the allegedly inherent feature must necessarily be present or occur. Inherency, however, may not be established by possibilities. See MPEP § 2112. If the Examiner is offering reasons why such a generator is obvious, Applicants submit that no proper teaching of such generator has been provided and that no motivation as to why it would have been obvious to include such a generator has been provided.

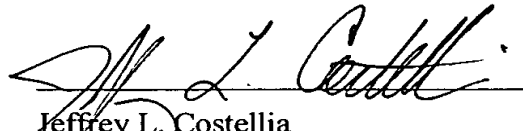
Thus, Applicants respectfully submit that the Examiner's explanation of a teaching for a n-speed field sequential color signal generation circuit is deficient. Furthermore, the Examiner has not addressed the issue regarding said n-speed field sequential color signal generation circuit comprises a third thin film transistor over said substrate, as variously recited in the independent claims. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejections. Alternatively, if the rejection is maintained Applicants respectfully request that the Examiner more fully disclose the teaching which are applied to the specific features of the presently claimed invention. Thus, Applicants respectfully submit that independent claims 1, 3, 6, 9 and 32-34 are allowable for at least the reasons described above.

Additionally, Applicants respectfully submit that dependent claims 2, 4, 5, 10-31 and 25-44 are dependent claims each depending from an independent claim. Applicants

respectfully submit that each dependent claim is allowable at least for reasons for the reasons described above, as well as for reasons of their own.

Because the claimed invention as presently amended clearly defines over the prior art of record, Applicants respectfully request reconsideration and withdrawal of the rejection. Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



Jeffrey L. Costellia
Registration No. 35,483

NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, Virginia 22102
(703) 770-9300
(703) 770-9400 FAX